

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

INSULATE SB, INC., et al., <i>Plaintiffs</i>	Civil Action No. 1:13-CV-01609-YK (Chief Judge Yvette Kane)
v.	
ABRASIVE PRODUCTS & EQUIPMENT, et al, <i>Defendants</i>	

**MOTION OF DEFENDANT C. H. REED, INC.,  
TO EXTEND TIME TO RESPOND TO COMPLAINT**

Defendant C. H. Reed, Inc. (CH Reed), by and through its undersigned counsel, respectfully files this Motion for an extension of time to respond to Plaintiff's Complaint, and in support thereof states as follows:

1. On June 14, 2013, Plaintiff filed a class action complaint raising complex antitrust claims, naming CH Reed, and others, as Defendants (Doc 1).
2. On June 28, 2013, the Complaint was served on CH Reed (Doc 39).
3. Because of the nature of the claims and the complexity of the issues raised as well as the press of other business, CH Reed desires an extension of time within which to file an answer to the Complaint.

4. CH Reed desires an extension of time to and including September 10, 2013, within which to file an answer to the Complaint.

5. CH Reed believes and therefore avers that Plaintiff will not be prejudiced by the brief extension of time requested.

6. CH Reed notes that other defendants have received additional time to respond to the Complaint.

7. The undersigned counsel requested Plaintiff's concurrence in the within motion, and said counsel has concurred in the request.

WHEREFORE, Defendant C. H. Reed, Inc., respectfully requests your Honorable Court extend the time within which it may file its answer to Plaintiff's Complaint to and including September 10, 2013.

BARLEY SNYDER

/s/ Paul W. Minnich

By: \_\_\_\_\_

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PA 74453  
Attorneys for C. H. Reed, Inc.

**CERTIFICATE OF CONCURRENCE**

I hereby certify that on August 13, 2013, Christopher A. Nedeau, counsel for Plaintiff, concurred in C. H. Reed, Inc.'s request for extension of time to answer the Complaint.

BARLEY SNYDER

/s/ Paul W. Minnich

By: \_\_\_\_\_

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PA 74453  
Attorneys for C. H. Reed, Inc.

Date: August \_\_\_\_13\_\_\_\_, 2013

### **CERTIFICATE OF SERVICE**

I hereby certify that on this date the foregoing Motion to Extend Time is being filed electronically with the Clerk via the Court's ECF system and is being served on counsel of record via transmission of notices via the ECF system.

**BARLEY SNYDER**

/s/ Paul W. Minnich

By: \_\_\_\_\_

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Date: August \_\_13\_\_\_\_, 2013